

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEONEL ADAIR ADAME,
aka "gliizzzy42," and
CAMERON DESEAN HULL,
aka "bagchasn_cam42,"

Defendants.

ED CR No. 5:23-cr-00244-PA

I N D I C T M E N T

[18 U.S.C. § 922(a)(1)(A):
Engaging in the Business of
Dealing in Firearms Without a
License; 21 U.S.C. § 846:
Conspiracy to Distribute Fentanyl
and Methamphetamine; 18 U.S.C.
§ 922(g)(1): Felon in Possession
of Firearms and Ammunition;
21 U.S.C. §§ 841(a)(1),
(b)(1)(B)(vi), (viii), (b)(1)(C):
Distribution of Fentanyl and
Methamphetamine; 21 U.S.C. § 853,
18 U.S.C. § 924(d)(1), 28 U.S.C.
§ 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 922(a)(1)(A), 2(a)]

[ALL DEFENDANTS]

Beginning on an unknown date, but no later than May 23, 2022,
and continuing through on or about October 25, 2022, in Riverside
County, within the Central District of California, and elsewhere,

defendants LEONEL ADAIR ADAME, also known as ("aka") "gliizzy42," and CAMERON DESEAN HULL, aka "bagchasn_cam42," aiding and abetting each other and others known and unknown to the Grand Jury, not personally being licensed as importers, manufacturers, or dealers of firearms, willfully engaged in the business of dealing in firearms, specifically, the sales of the following firearms on or about the following dates and attempted sales of other firearms, including firearms of unknown manufacturer and bearing no legitimate manufacturer's mark or serial number (commonly referred to as "ghost guns" or "privately manufactured firearms"):

Date	Firearms
May 24, 2022	A privately manufactured 9mm caliber pistol
June 1, 2022	A privately manufactured .40 caliber pistol.
June 14, 2022	A Colt, Model 1911, .45 caliber pistol, bearing serial number 371127.

COUNT TWO

[21 U.S.C. § 846]

[ALL DEFENDANTS]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, but no later than June 1, 2022, and continuing to on or about October 25, 2022, in Riverside County, within the Central District of California, and elsewhere, defendants LEONEL ADAIR ADAME, also known as ("aka") "gliizzy42," and CAMERON DESEAN HULL, aka "bagchasn_cam42," and others known and unknown to the Grand Jury, conspired with each other to knowingly and intentionally distribute the following controlled substances:

1. At least 40 grams of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B)(vi); and

2. At least five grams of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B)(viii).

B. MANNER AND MEANS OF THE CONSPIRACY

The objects of the conspiracy were to be accomplished, in substance, as follows:

1. Defendants ADAME and HULL would advertise and accept orders for controlled substances, including pills resembling "M30" oxycodone pills containing fentanyl ("fentanyl pills") and methamphetamine, through Instagram.

1 2. Defendants ADAME and HULL would obtain controlled
2 substances from known and unknown sources of supply for distribution
3 to customers.

4 3. Defendants ADAME and HULL would distribute controlled
5 substances to customers.

6 C. OVERT ACTS

7 In furtherance of the conspiracy and to accomplish its objects,
8 on or about the following dates, defendants ADAME and HULL, and
9 others known and unknown to the Grand Jury, committed various overt
10 acts within the Central District of California, and elsewhere,
11 including, but not limited to, the following:

12 Overt Act No. 1: On June 1, 2022, following the sale of a
13 firearm to an undercover agent with the United States Bureau of
14 Alcohol, Tobacco, Firearms, and Explosives (the "UC") who pretended
15 to be a firearm and controlled substance purchaser, defendant ADAME
16 discussed selling methamphetamine to the UC.

17 Overt Act No. 2: On June 14, 2022, defendants ADAME and HULL
18 sold the UC a Colt, Model 1911, .45 caliber pistol, bearing serial
19 number 371127, and pills constituting approximately 3.445 grams of a
20 substance containing fentanyl.

21 Overt Act No. 3: On June 14, 2022, defendants ADAME and HULL
22 discussed future drug transactions with the UC, and defendant ADAME
23 told the UC that the UC could contact defendant HULL to obtain
24 methamphetamine.

25 Overt Act No. 4: On June 21, 2022, defendant HULL met with
26 the UC and sold the UC pills constituting approximately 98.1 grams of
27 a substance containing fentanyl.

1 Overt Act No. 5: On August 23, 2022, defendants ADAME and
2 HULL met with the UC and sold the UC pills constituting approximately
3 77 grams of a substance containing fentanyl.

4 Overt Act No. 6: On October 25, 2022, defendant HULL met with
5 the UC and sold the UC approximately 45 grams of methamphetamine.
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COUNT THREE

[18 U.S.C. § 922(g)(1)]

[DEFENDANT ADAME]

On or about May 24, 2022, in Riverside County, within the Central District of California, defendant LEONEL ADAIR ADAME, also known as "gliizzy42," knowingly possessed the following ammunition, in and affecting interstate and foreign commerce:

1. Three rounds of Blazer 9mm caliber ammunition;
2. One round of Remington-Peters 9mm caliber ammunition;
3. One round of GFL 9mm caliber ammunition; and
4. One round of Barnaul 9mm caliber ammunition.

Defendant ADAME possessed such ammunition knowing that he had previously been convicted of a felony crime punishable by a term of imprisonment exceeding one year, namely, Vandalism, in violation of California Penal Code Section 594(a), in the Superior Court of the State of California, County of Riverside, case number RIF2100807, on or about April 2, 2021.

COUNT FOUR

[18 U.S.C. § 922(g)(1)]

[DEFENDANT ADAME]

On or about June 1, 2022, in Riverside County, within the Central District of California, defendant LEONEL ADAIR ADAME, also known as "gliizzy42," knowingly possessed ammunition, namely, four rounds of Federal .40 caliber ammunition, in and affecting interstate and foreign commerce.

Defendant ADAME possessed such ammunition knowing that he had previously been convicted of a felony crime punishable by a term of imprisonment exceeding one year, namely, Vandalism, in violation of California Penal Code Section 594(a), in the Superior Court of the State of California, County of Riverside, case number RIF2100807, on or about April 2, 2021.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

[ALL DEFENDANTS]

On or about June 14, 2022, in Riverside County, within the Central District of California, defendants LEONEL ADAIR ADAME, also known as ("aka") "gliizzy42," and CAMERON DESEAN HULL, aka "bagchasn_cam42," aiding and abetting each other, knowingly and intentionally distributed fentanyl, a Schedule II narcotic drug controlled substance.

COUNT SIX

[18 U.S.C. § 922(g)(1)]

[DEFENDANT ADAME]

On or about June 14, 2022, in Riverside County, within the Central District of California, defendant LEONEL ADAIR ADAME, also known as "gliizzy42," knowingly possessed the following firearm and ammunition, in and affecting interstate and foreign commerce:

1. A Colt, Model 1911, .45 caliber pistol, bearing serial number 371127; and

2. Nine rounds of Winchester .45 caliber ammunition.

Defendant ADAME possessed such firearm and ammunition knowing that he had previously been convicted of a felony crime punishable by a term of imprisonment exceeding one year, namely, Vandalism, in violation of California Penal Code Section 594(a), in the Superior Court of the State of California, County of Riverside, case number RIF2100807, on or about April 2, 2021.

COUNT SEVEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(vi)]

[DEFENDANT HULL]

On or about June 21, 2022, in Riverside County, within the Central District of California, defendant CAMERON DESEAN HULL, also known as "bagchasn_cam42," knowingly and intentionally distributed at least 40 grams, that is, approximately 98.1 grams, of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II narcotic drug controlled substance.

COUNT EIGHT

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(vi); 18 U.S.C. § 2(a)]

[ALL DEFENDANTS]

On or about August 23, 2022, in Riverside County, within the Central District of California, defendants LEONEL ADAIR ADAME, also known as ("aka") "gliizzy42," and CAMERON DESEAN HULL, aka "bagchasn_cam42," aiding and abetting each other, knowingly and intentionally distributed at least 40 grams, that is, approximately 77 grams, of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II narcotic drug controlled substance.

COUNT NINE

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

[DEFENDANT HULL]

On or about October 25, 2022, in Riverside County, within the Central District of California, defendant CAMERON DESEAN HULL, also known as "bagchasn_cam42," knowingly and intentionally distributed at least five grams, that is, approximately 45 grams, of methamphetamine, a Schedule II controlled substance.

FORFEITURE ALLEGATION ONE

[21 U.S.C. § 853; 18 U.S.C. § 924; 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Counts Two, Five, Seven, Eight, or Nine of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting or derived from, any proceeds which the defendant obtained, directly or indirectly, from any such offense;

(b) All right, title and interest in any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any such offense;

(c) All right, title, and interest in any firearm or ammunition involved in or used in any such offense; and

(d) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a), (b), or (c).

3. Pursuant to Title 21, United States Code, Section 853(p), and as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property if, by any act or omission of the defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be

1 located upon the exercise of due diligence; (b) has been transferred,
2 sold to, or deposited with a third party; (c) has been placed beyond
3 the jurisdiction of the court; (d) has been substantially diminished
4 in value; or (e) has been commingled with other property that cannot
5 be divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Counts One, Three, Four, or Six of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any firearm or ammunition involved in or used in any such offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof

(a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

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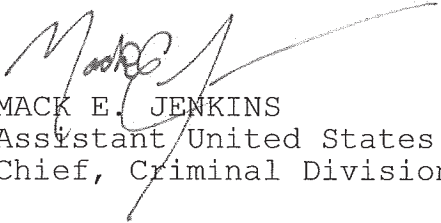
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1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

3 A TRUE BILL

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5 151
6 Foreperson

7 E. MARTIN ESTRADA
8 United States Attorney

9 
10 MACK E. JENKINS
11 Assistant United States Attorney
12 Chief, Criminal Division

13 SEAN D. PETERSON
14 Assistant United States Attorney
15 Chief, Riverside Branch Office

16 JOHN A. BALLA
17 Assistant United States Attorney
18 Deputy Chief, Riverside Branch
19 Office
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